

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES of AMERICA,)	Case No. 3:15CR0024
)	
Plaintiff.)	
)	JUDGE JAMES G. CARR
)	
vs.)	
)	
)	
)	MOTION TO EXTEND TIME
ANA ANGELICA PEDRO JUAN,)	TIME TO FILE PRE-TRIAL MOTIONS
aka JUANITA aka ERICA MAISONET)	
Defendant)	
)	

Now comes defendant, Ana Angelica Pedro Juan, by and through undersigned counsel, and hereby moves this court to extend the filing period to file pre-trial motions until January 11, 2016.

Counsel states that due to the nature of the prosecution and anticipated voluminous discovery additional time is need to properly prepare for the filing of pre-trial motions. The United States Attorney's Office does not oppose this extension of time.

Wherefore, defendant moves this court to extend the time to file pre-trial motions until January 11, 2016.

Respectfully submitted,

/s/ Merle R. Dech, Jr.
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Date: December 8, 2015

CERTIFICATE OF SERVICE

This is to certify that this foregoing motion was electronically filed on December 8, 2015
and served by electronic filing.

/s/ Merle R. Dech, Jr.